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LEE W. SHUBERT  
ADMITTED IN VA & DC

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MAR 15 1995  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY  
DIRECT DIAL  
(703) 841-3935

March 15, 1995

OUR FILE NO.  
1137-103-60

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

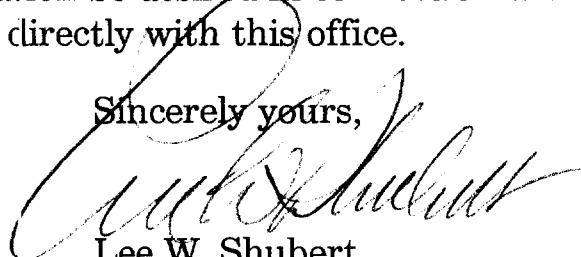
Re: MM Docket No. 95-7; RM 8561

Dear Mr. Caton:

Transmitted herewith, on behalf of Faircom Flint Inc., is an original and four copies of the "COMMENTS OF FAIRCOM FLINT INC." concerning the above-referenced proceeding, and the proposal of Faircom Flint Inc. to *inter alia* substitute FM Channel 268A in lieu of Channel 269A at Tuscola, Michigan.

Should further information be desired in connection with this matter, kindly communicate directly with this office.

Sincerely yours,

  
Lee W. Shubert

Enclosures (5)

LWS/blr

No. of Copies rec'd 0-4  
List ABCDE

Before The  
**Federal Communications Commission**  
Washington, D.C. 20554

**RECEIVED**  
**MAR 15 1995**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM DOCKET No. 95-7
Table of Allotments	)	RM No. 8561
FM Broadcast Stations,	)	
	)	
Coleman, Tuscola and Sebewaing,	)	DOCKET FILE COPY ORIGINAL
Michigan	)	

TO: Chief, Mass Media Bureau

**COMMENTS OF FAIRCOM FLINT INC.**

Faircom Flint Inc. ("Faircom") licensee of Station WWBN(FM)<sup>1</sup> Channel 269A, Tuscola, Michigan, and proponent, among others of the change of WWBN's operating channel to 268A, by its attorneys and pursuant to the Notice of Proposed Rule Making ("NPRM") (DA 95-46) released January 23, 1995, in the above-captioned matter, hereby submits its Comments in support of the following proposed changes in the FM Table of Allotments (Section 73.202(b) of the Rules):

<b>CITY</b>	<b>PRESENT</b>	<b>PROPOSED</b>
Coleman, Michigan	268A	269A <sup>2</sup>
Tuscola, Michigan	269A	268A <sup>3</sup>
Sebewaing, Michigan	267A	281A <sup>4</sup>

<sup>1</sup> The NPRM incorrectly lists the Station's call letters as WBBN.

<sup>2</sup> Channel 269A can be allocated to Coleman at WPRJ's present transmitter location, North 43° 48' 41", West 84° 27' 57". (See attached Petition for Rule Making, Attachment A, p. 1).

<sup>3</sup> In order to meet spacing requirements a site restriction at approximately North 43° 16' 02", West 83° 45' 34" is necessary (See attached Petition for Rule Making, Attachment A, p. 1).

<sup>4</sup> In order to meet spacing requirements a site restriction at approximately North 43° 39' 30", West 83° 31' 00" is necessary (See attached Petition for Rule Making, Attachment A, p. 1).

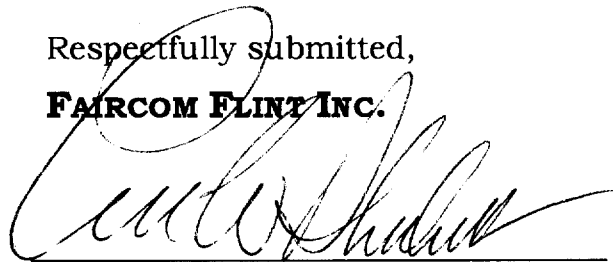
As authorized in the NPRM (Appendix), Faircom's Petition for Rule Making is hereby incorporated by reference and a copy is attached to and made a part of these Comments. Faircom also confirms that it will reimburse WPRJ Coleman, Michigan, for those costs incident to its change of channels and, if Channel 268A is allocated to Tuscola, Michigan, Faircom will immediately proceed to implement the modification of WWBN's license.

In view of the foregoing, the Commission is urged to implement the NPRM and amend Section 73.202 of the Rules — the FM Table of allotments - in the following respects:

<b>CITY</b>	<b>PRESENT</b>	<b>PROPOSED</b>
Coleman, Michigan	268A	269A <sup>2</sup>
Tuscola, Michigan	269A	268A <sup>3</sup>
Sebewaing, Michigan	267A	281A <sup>4</sup>

Respectfully submitted,

**FAIRCOM FLINT INC.**



Richard M. Riehl, Esq.

Lee W. Shubert, Esq.

Its Attorneys

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March 15, 1995

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RICHARD M. RIEHL

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

November 18, 1994

OUR FILE NO.  
1137-103-~~61~~63

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

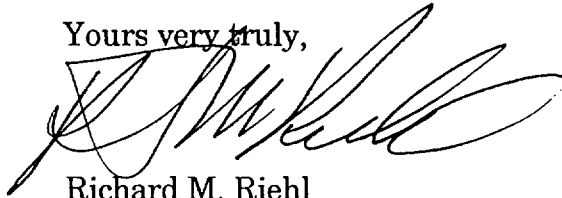
RE: Petition for Rule Making to Amend Section 73.202(b),  
The Table of Allotments, at Coleman, Tuscola and Sebewaing, MI

Dear Mr. Caton:

On behalf of Faircom Flint Inc., please find enclosed an original and four copies of a Petition for Rule Making to modify the Table of Allotments to substitute Channel 269A for Channel 268A at Coleman, Michigan and Channel 268A for Channel 269A at Tuscola, Michigan. In addition, to accommodate this allocation, the Petition proposes to substitute Channel 281A for Channel 267A at the vacant allotment at Sebewaing, Michigan.

Should you have any questions concerning this matter please contact this office directly.

Yours very truly,



Richard M. Riehl

Enclosures  
RMR/das

Before The  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No.
Table of Allotments	)	RM No.
FM Broadcast Stations,	)	
	)	
Coleman, Tuscola and Sebewaing,	)	
Michigan	)	

TO: Chief, Mass Media Bureau

**PETITION FOR RULE MAKING**

Faircom Flint Inc. ("Faircom") licensee of Station WKMF(FM) Channel 269A, Tuscola, Michigan, by its attorneys and pursuant to Section 1.420(g)(3) of the Rules, hereby requests the Commission to amend the FM Table of Allotments (Section 73.202(b) of the Rules) as follows:

<u>CITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Coleman, Michigan	268A	269A <sup>1</sup>
Tuscola, Michigan	269A	268A <sup>2</sup>
Sebewaing, Michigan	267A	281A <sup>3</sup>

and to order the licenses of Stations WKMF and WPRJ to be modified accordingly. In support of this request, the following is respectfully submitted:

<sup>1</sup> Channel 269A can be allocated to Coleman at WPRJ's present transmitter location, North 43° 48' 41", West 84° 27' 57". See Attachment A, p. 1.

<sup>2</sup> In order to meet spacing requirements a site restriction at approximately North 43° 16' 02", West 83° 45' 34" is necessary (See Attachment A, p. 1).

<sup>3</sup> In order to meet spacing requirements a site restriction at approximately North 43° 39' 30", West 83° 31' 00" is necessary (See Attachment A, p. 1).

### **BACKGROUND**

Stations WKMF and WPRJ are currently restricted to operating with 3kW ERP, are short-spaced to several allotments and WKMF operating on its present channel receives interference in its normal service area from Stations WILS-FM, Flint and WDET, Detroit, Michigan. Petitioner's consulting engineers, Hatfield & Dawson, have concluded that by exchanging the channel allotments at Tuscola and Coleman, both Stations will be able to operate with 6 kW ERP. Such a change will, at the same time, improve the allocation situation on these channels both domestically and in Canada. However, the assigned allocation at Sebawaing, Michigan will need to be changed from Channel 267A to 281A.

### **DISCUSSION**

Section 1.420(g)(3) of the Rules authorizes the Table of Allotments to be amended and modification of the license of the affected FM station to upgrade its facilities where the amended allotment would be mutually exclusive with the present assignment. In this case, since first adjacent channel allotments are involved, such improvement must be afforded both stations or there can be no improvement at all. As set forth below, the proposed changes in allotments satisfies all of the criteria and objectives of Section 1.420(g)(3) of the Rules<sup>4</sup>.

---

<sup>4</sup> This exchange of channels would appear to qualify as an "Incompatible Channel Swap". See *Modification of FM Broadcast Licenses*, 60 RR2d 114, 120 (para. 24) (1986). Accord. *FM Channel Assignments, Blair, Nebraska*, 8 FCC Rcd 4086, 4088 (MMB 1986).

**A. Allocation of Channel 268A  
at Tuscola**

As reflected in Mr. Lockwood's technical study, the substitution of Channel 268A for Channel 269A at Tuscola, Michigan will permit Station WKMF to become a full Class A station operating with 6kW ERP. Except for the present Coleman and Sebewaing, Michigan allocations, the proposed operation of Station WKMF on Channel 268A from the reference site fully meets the protection requirements for all domestic and foreign allotments. Further, since the reference site is located only 10.6 km from the Tuscola community reference coordinates and the predicted 6kW/100m 70 dBu contour extends to 16.3 km, it is clear City coverage of Tuscola can be achieved from the reference location. See Attachment A, pp. 1 and 2.

**Domestic Considerations - The Coleman and Sebewaing Allocations.**

Specifically with respect to the **Coleman, Michigan** allocation, without changing the FM Channel allotment at Coleman, Michigan from 268A to Channel 269A, there would be a short spacing of 31.8 km (Attachment A, Ex. 2, p. 3). However, as discussed in more detail *infra.*, Channel 269A can be allotted to Coleman, in lieu of Channel 268A, at Station WPRJ's present transmitter location in full compliance with all domestic and foreign allocations requirements. Further, this proposed change in the Coleman allocation will, for the first time, permit the operation of Station WPRJ with full Class A facilities.

As to the **Sebewaing, Michigan** allotment, the proposed allocation of Channel 268A at Tuscola is 5.8 km short spaced to the

vacant allocation of Channel 267A at Sebewaing, Michigan. (Attachment A, Ex. 2, p. 3)<sup>5</sup>. There are no applications pending for the present allotment, and thus a change of this allocation to Channel 281A will inconvenience no one. Further, the allocation of Channel 281A at the proposed reference location (N 43-39-30; W 83-31-00) meets all of the separation requirements for domestic and foreign allotments (Attachment A, p. 3 and Ex. 3). Finally, since the reference site is located only 9.76 km from the Sebewaing community reference coordinates and the predicted 6kW/100m 70 dBu contour extends to 16.3 km, it is clear City coverage of Sebewaing can be achieved from the reference location. See Attachment A, p. 3 and Ex. 3, p. 4.

#### **Canadian Considerations.**

The allotment of Channel 268A at the proposed Tuscola reference location is fully spaced for 6kW Class A operation under the Domestic Rules<sup>6</sup> to the unused co-channel Canadian allotment at Sarnia, Ontario (Attachment A, p. 2). Further, operation of WKMF with 6kW at 100m HAAT completely satisfies the requirements for proposed allotments which do not conform to the *Table of Minimum Distance Separations* set forth in the *Working Arrangement* with Canada, Section 5.1.2 *et seq.* (Attachment A, p. 2). The attached map (Attachment A, Ex. 1, p. 5), demonstrates that the 34 dBu F(50;10) contour of the proposed Channel 268A allocation at Tuscola does not extend onto Canadian territory within the protected 54 dBu contour of the Sarnia co-channel allocation.

<sup>5</sup> This allocation has been available for application since the end of 1990.

<sup>6</sup> Notification of a Class B-1 station to Canada with a restriction of 6kW at 100m HAAT will be required. (Attachment A, p. 2)



In addition, while not an allocation mandate, it should be noted that, based on domestic allocations criteria, the situation between WKMF, Tuscola and CKNX, Wingham, Ontario (Ch. 269C1) will be improved. These allocations, with WKMF operating with only 3kW, are presently short-spaced by 49.6 km. Operation of WKMF on Channel 268A will entirely eliminate this short-spacing. (Attachment A, Ex. 1, pp. 1 and 4).

**Additional Public Interest Considerations.**

WKMF's present facilities are short-spaced by 10 km to co-channel station WILS, Lansing and by 5.5 km to WDET (Channel 270B-grandfathered with 79kW at 137m HAAT). (Attachment A, Ex. 1, p. 1). In addition, actual interference in WKMF's normal service area is being experienced from these stations. The change in channel allotment at Tuscola to Channel 268A will eliminate these short-spacings and improve service on these respective channels.

**B. Allocation of Channel 269A  
at Coleman, Michigan**

As with the change in the Tuscola allocation, the exchange of Channel 269A for Channel 268A at Coleman, Michigan will permit Station WPRJ to achieve full Class A operation -- something impossible to achieve with the present allocation. (Attachment A, p. 2).

Mr. Lockwood's study establishes that the substitution of Channel 269A for Channel 268A at Coleman, Michigan at Station WPRJ's present transmitter location meets all domestic and foreign allotments requirements. (Attachment A, p. 2).

Faircom hereby commits to pay those costs incident to WPRJ's channel change as required by the Commission.

### **Conclusion**

The foregoing establishes that Channels 268A and 269A can be substituted at Tuscola and Coleman, Michigan respectively in full compliance with all domestic and foreign allotment requirements at the indicated reference coordinates, subject only to the substitution of Channel 281A for the vacant Channel 267A allotment at Sebewaing, Michigan. The allocation of Channel 281A at Sebewaing also satisfies all domestic and foreign allocations requirements. The change will also permit both stations - now operating with 3kW ERP - to become full Class A FM Stations.

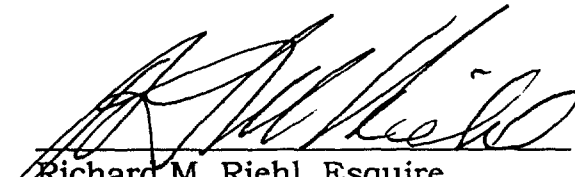
In addition, the assignment of Channel 268A at Tuscola will alleviate significant existing short-spacings with Stations WDET, Detroit and WILS, Lansing, Michigan. Finally, Faircom has committed to reimburse WPRJ Coleman for those costs incident to its change of channels and, if Channel 268A is allocated to Tuscola, Faircom will immediately proceed to implement the modification of WKMF's license.

In view of the foregoing, the Commission is requested to amend Section 73.202 of the Rules - the FM Table of allotments - in the following respects:

<u>CITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Coleman, Michigan	268A	269A <sup>7</sup>
Tuscola, Michigan	269A	268A <sup>8</sup>
Sebewaing, Michigan	267A	281A <sup>9</sup>

Respectfully submitted,

**FAIRCOM FLINT INC.**



Richard M. Riehl, Esquire  
Its Attorney

HALEY, BADER & POTTS  
4350 North Fairfax Drive, Suite 900  
Arlington, VA 22203-1633  
703/841-0606

November 18, 1994

<sup>7</sup> Channel 269A can be allocated to Coleman at WPRJ's present transmitter location, North 43°48'41", West 84°27'57". See Attachment A, p. 1.

<sup>8</sup> In order to meet spacing requirements a site restriction at approximately North 43° 16' 02", West 83° 45' 34" is necessary (See Attachment A, p. 1).

<sup>9</sup> In order to meet spacing requirements a site restriction at approximately North 43° 39' 30", West 83° 31' 00" is necessary (See Attachment A, p. 1).

JAMES B. HATFIELD, PE  
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THOMAS M. ECKELS, PE

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## ENGINEERING STATEMENT

### PETITION FOR RULEMAKING TO AMEND SECTION 73.202 OF THE RULES AND REGULATIONS OF THE FEDERAL COMMUNICATIONS COMMISSION

FAIRCOM FLINT, INC.

NOVEMBER 1994

## ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Faircom Flint, Inc. in support of a Petition for Rulemaking to revise §73.202 of the Commission's Rules to reassign the following channels:

CITY	PRESENT	PROPOSED
WPRJ Coleman, Michigan	268A	269A
WKMF Tuscola, Michigan	269A	268A
Unused Sebewaing, Michigan	267A	281A

The purpose of this reassignment is to provide full class A allotment to all three communities. The present allocations for Coleman and Tuscola are short-spaced to other stations and are unable to implement full class A service to their communities. The following table is a summary of the proposed locations in the reassignment plan:

	Present Site	Proposed Site	Change (Distance and Bearing)	Distance to City of License
WPRJ Coleman, Michigan	43° 48' 41" 84° 27' 57"	43° 48' 41" 84° 27' 57"	No Change	11.4 km 237.8° T
WKMF Tuscola, Michigan	43° 16' 12" 83° 30' 14"	43° 16' 02" 83° 45' 34"	20.8 km 269.2° T	10.6 km 51.5° T
Unused Sebewaing, Michigan	43° 48' 01" 83° 23' 38"	43° 39' 30" 83° 31' 00"	18.6 km 212.0° T	9.8 km 32.7° T

### **WPRJ Coleman, Michigan**

The proposed allotment of channel 269A at Coleman, Michigan meets all of the separation requirements for domestic and foreign allotments from the licensed site of WPRJ, except for the present Tuscola allotment that is proposed to be changed. This change will allow WPRJ to operate with the maximum class ERP of 6 kW. The WPRJ site is located 11.4 km from the reference coordinates for the community of Coleman; therefore 70 dBu coverage of the community will be achieved.

### **WKMF Tuscola, Michigan**

As shown in the attached channel studies, WKMF can operate from a reference site at 43° 16' 03" x 83° 45' 34" and fully meet the protection requirements for all domestic and foreign allotments, except for the present Coleman (WPRJ) and Sebawaing (Unused) allotments that are proposed to be changed. The reference site is fully spaced for 6 kW class A operation under the domestic rules from the channel 268A co-channel allotment (Unused) at Sarnia, Ontario. Notification as a class B-1 station to Canada would be required, with a restriction to operation at 6 kW and an antenna height of 100 meters above average terrain. Operation with 6 kW at an antenna height of 100 meters above average terrain fully meets the requirements for proposed allotments that do not confirm to the Table of Minimum Distance Separations set out in the *"Agreement Between the Government of Canada and the Government of the United States of America Relating the FM Broadcasting Service and the Associated Working Arrangement, Ottawa, February 1991"* with Canada, per Sections 5.2 of the Working Arrangement. The attached map shows that the 34 dBu F(50:10) contour of the proposed channel 268A allotment does not extend onto Canadian territory; all of the overlap between the proposed 34 dBu contour and the protected 54 dBu F(50:50) contour (33 km radius) of the Sarnia, Ontario co-channel allotment occur within U.S. territory. The reference site is located 10.6 km from the reference coordinates for the community of Tuscola, and therefore 70 dBu coverage of the community will be achieved.

**Vacant Allotment Sebewaing, Michigan**

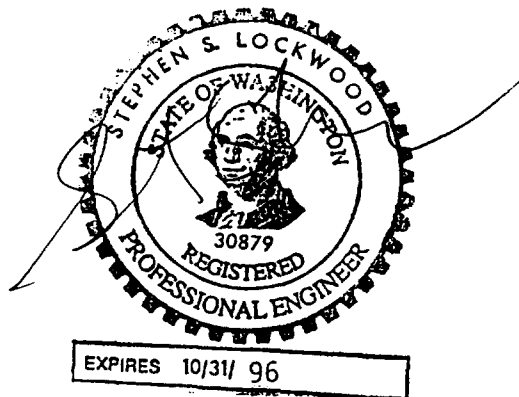
The proposed allotment of channel 281 at Sebewaing meets all of the separation requirements for domestic and foreign allotments at a new set of reference coordinates; 43° 39' 30" X 83° 31' 00". The reference site is located 9.8 km from the reference coordinates for the community of Sebewaing, therefore 70 dBu coverage of the community will be achieved.

**CERTIFICATION**

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments has been prepared on behalf of Faircom Flint, Inc. All representations herein are true to the best of my knowledge. I am an experienced radio engineer Whose qualifications are a matter of record with the Federal Communications Commission. I am a staff engineer with the firm of Hatfield & Dawson, Consulting Engineers, and am Registered as a Professional Engineer in the State of Washington.

16 November 1994

Stephen S. Lockwood, P.E.



**Appendix 1**  
**Exhibits for**  
**WPRJ(FM) Coleman, Michigan**



Basic Station Data

Station:	WPRJ	City:	Coleman
Frequency:	101.5 MHz	State:	MI
Channel:	268	Country:	US
Class:	A	Coordinates:	N 43 48 41
Facility:	FM		W 84 27 57

Domestic Status: LIC  
File Number: BLH-921120KC  
Docket:  
Cutoff Date:  
Section 73.215: N  
Last Change Date: 930409  
FM Database Date: 940927

	Horizontal	Vertical
ERP:	2.200 kW	2.200 kW
Rad Center AGL:	112 m	112 m
Rad Center AMSL:	328 m	328 m
HAAT:	114 m	114 m
HAAT Max:	126 m	

Beam Tilt: N  
Directional Antenna: N

Coordination/Notification

International Status:	OPER	Operating primary assignment
Coordination Status:		Not applicable
Border:	Canada	
Distance:	181 km	
Last Notify Date:		
International Class:	A	

Applicant/Licensee Name  
Come Together Ministries, Inc.

Comment  
( None.

FM SEPARATION STUDY

Job Title : Licensed WPRJ(FM) CH 268

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 268A (101.5 MHz)

Coordinates : 43-48-41 84-27-57

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
----------------	---------------	--------------	------------------	--------------------	-----------------------	--------------------	---------------	--------------

WQAC	Alma		215A	0.1	43-22-46	199.3	50.85	10
LIC	MI	BLED930402KA	90.9	20.0	84-40-25		40.85	CLEAR

WBTZ	Pinconning		265A	2.6	43-50-46	82.5	30.31	31
CP	MI	BPH891106IE	100.9	151.0	84-05-32		-.69	SHORT
CP Cancelled 940121-307 Application being treated as Petition for Recon. Proposed to Canada as B1 on 900306-Specially negotiated short spaced allotment w/Power Ltd. to 2.6kw and Haat not to exceed 167m-Accepted by Canada on 910305								

WBTZ	Pinconning		265A	1.30	43-50-46	82.5	30.31	31
LIC	MI	BLH880826KD	100.9	151.0	84-05-32		-.69	SHORT

JRYFM	Roscommon		266A	3.40	44-34-15	348.0	86.32	31
LIC	MI	BLH900322KB	101.1	135.0	84-41-33		55.32	CLEAR
Class B1 with respect to Canada								

ALC	Sebewaing		267A		43-48-01	90.5	86.28	72
	MI	Docket89-38	101.3	.0	83-23-38		14.28	CLOSE
Class B1 in respect to Canada-Accepted by Canada 901105 Site Restricted-Effective 12-28-89-Rsvd for 871008ID per D89-38								

WCUZFM	Grand Rapids		267B	50.	43-02-28	220.4	111.99	113
LIC	MI	BLH5400	101.3	128.0	85-21-28		-1.01	SHORT

WCUZFM	Grand Rapids		267B	26.	43-02-28	225.1	120.76	113
CP	MI	BPH890623ID	101.3	214.0	85-31-04		7.76	CLOSE

WCUZFM	Grand Rapids		267B	50.0	43-02-01	224.9	121.53	113
APP	MI	BMPH940720IB	101.3	129.0	85-31-15		8.53	CLOSE

PRJ	Coleman		268A	2.2	43-48-41	.0	.00	115
LIC	MI	BLH921120KC	101.5	114.0	84-27-57		-115.00	SHORT

WXYQ	Manistee		268A	6.0	44-12-18	287.3	152.66	115
CP	MI	BPH900410MH	101.5	35.0	86-17-22		37.66	CLEAR
Accepted by Canada on 921013								

	Sarnia		268A		42-58-20	118.5	191.84	180
	ON		101.5	.0	82-23-48		11.84	CLOSE

SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION.

FM SEPARATION STUDY

Job Title : Licensed WPRJ(FM) CH 263

Separation Buffer 50 km

FCC DB Date : 10/25/94

Channel 268A (101.5 MHz)

Coordinates : 43-48-41 84-27-57

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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WKMFFM	Tuscola		269A	3.00	43-16-12	127.5	98.31	72
LIC	MI	BLH880404KC	101.7	100.0	83-30-14		26.31	CLEAR
Specially negotiated, short-spaced allotment-Accepted by Canada 940207								

WILSFM	Lansing		269A	3.3	42-43-16	183.3	121.33	72
LIC	MI	BLH930430KB	101.7	88.0	84-33-01		49.33	CLEAR
Accepted by Canada on 930322								

WLDR	Traverse City		270C1	100.	44-46-13	317.9	144.86	75
LIC	MI	BLH920403KB	101.9	192.0	85-41-43		69.86	CLEAR

WLEWFM	Bad Axe		271C2	50.	43-53-28	84.8	108.28	55
LIC	MI	BLH890117KK	102.1	150.0	83-07-26		53.28	CLEAR

\*\* End of separation study for channel 268A \*\*

FM SEPARATION STUDY

Job Title : Proposed WPRJ(FM) CH 269

Separation Buffer 50 km

Channel 269A (101.7 MHz)

FCC DB Date : 10/25/94  
Coordinates : 43-48-41 84-27-57

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WQAC LIC	Alma MI	BLED930402KA	215A 90.9	0.1 20.0	43-22-46 84-40-25	199.3	50.85 40.85	10 CLEAR
WGRYFM LIC	Roscommon MI	BLH900322KB	266A 101.1	3.40 135.0	44-34-15 84-41-33	348.0	86.32 55.32	31 CLEAR
Class B1 with respect to Canada								
ALC	Sebewaing MI	Docket89-38	267A 101.3	.0	43-48-01 83-23-38	90.5	86.28 55.28	31 CLEAR
Class B1 in respect to Canada-Accepted by Canada 901105 Site Restricted-Effective 12-28-89-Rsvd for 871008ID per D89-38								
WCUZFM LIC	Grand Rapids MI	BLH5400	267B 101.3	50. 128.0	43-02-28 85-21-28	220.4	111.99 42.99	69 CLEAR
WPRJ LIC	Coleman MI	BLH921120KC	268A 101.5	2.2 114.0	43-48-41 84-27-57	.0	.00 -72.00	72 SHORT
WKMFFM LIC	Tuscola MI	BLH880404KC	269A 101.7	3.00 100.0	43-16-12 83-30-14	127.5	98.31 -16.69	115 SHORT
Specially negotiated, short-spaced allotment-Accepted by Canada 940207								
WILSFM LIC	Lansing MI	BLH930430KB	269A 101.7	3.3 88.0	42-43-16 84-33-01	183.3	121.33 6.33	115 CLOSE
Accepted by Canada on 930322								
WMRR LIC	Muskegon Heights MI	BLH930624KG	269B1 101.7	15.0 93.0	43-16-38 86-20-05	249.1	162.29 19.29	143 CLEAR
From Channel 269A Per D91-337								
WMRR P	Muskegon Heights MI	BPH931216ID	269B1 101.7	12.0 145.0	43-16-38 86-20-05	249.1	162.29 19.29	143 CLEAR
CKNXFM ON	Wingham ON		269C1 101.7	100. DA 216.0	44-05-26 81-12-26	82.1	263.42 7.42	256 CLOSE
SPECIALLY NEGOTIATED SHORT-SPACED ALLOCATION								
WLDR LIC	Traverse City MI	BLH920403KB	270C1 101.9	100. 192.0	44-46-13 85-41-43	317.9	144.86 11.86	133 CLOSE

FM SEPARATION STUDY

Job Title : Proposed WPRJ(FM) CH 269

Separation Buffer 50 km

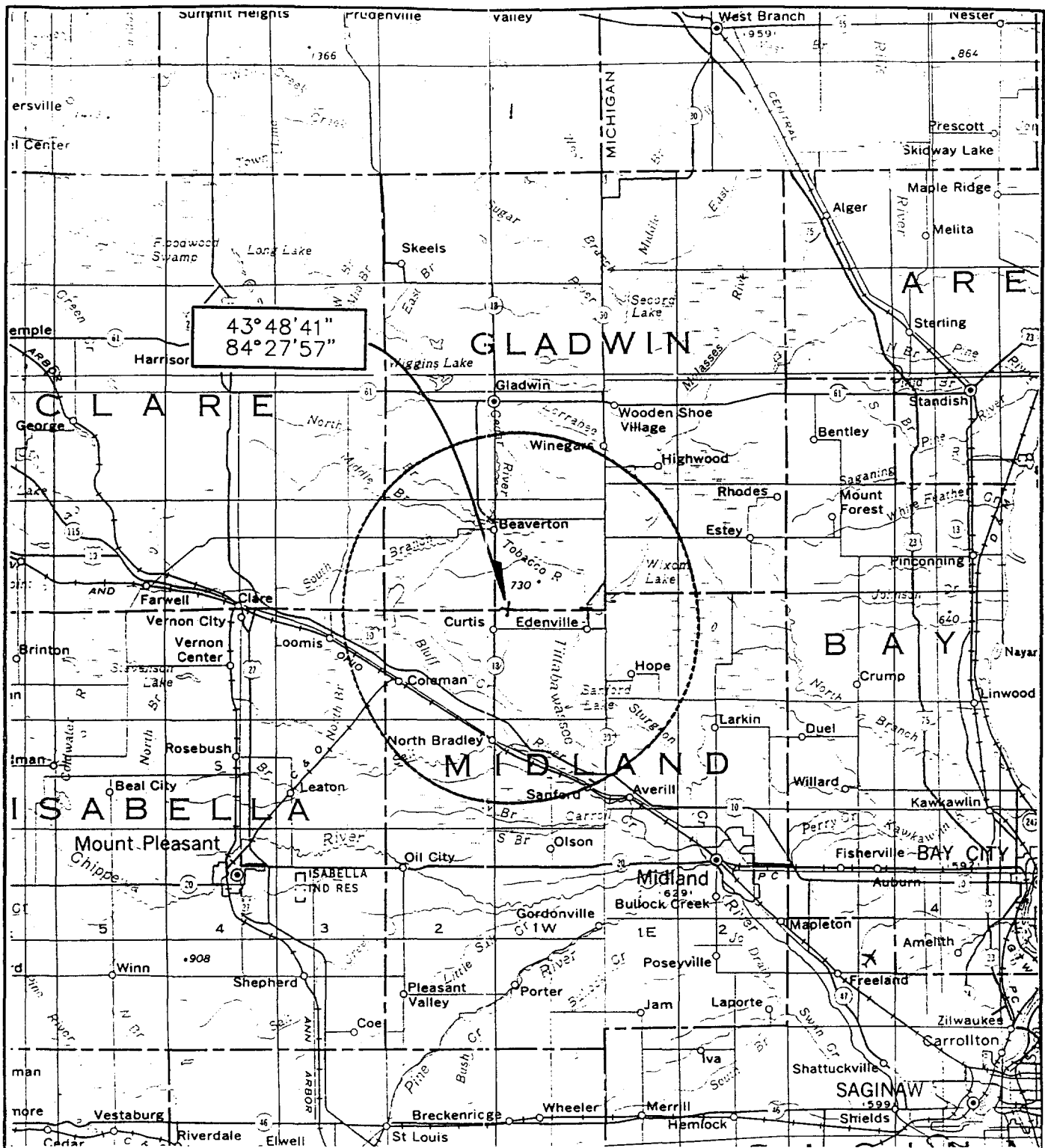
FCC DB Date : 10/25/94

Channel 269A (101.7 MHz)

Coordinates : 43-48-41 84-27-57

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
WLEWFM LIC	Bad Axe MI	BLH890117KK	271C2 102.1	50. 150.0	43-53-28 83-07-26	84.8	108.28 53.28	55 CLEAR
WPZX LIC	Big Rapids MI	BLH921112KE	272C3 102.3	10.5 133.0	43-41-01 85-34-56	261.4 SS	91.05 49.05	42 CLEAR

\*\* End of separation study for channel 269A \*\*



HATFIELD & DAWSON  
CONSULTING ENGINEERS

COLEMAN, MI  
PROPOSED WPRJ(FM) OPERATION ON  
CHANNEL 269A 6kW ERP AT 100m HAAT

FAIRCOM FLINT, INC

11/94

**Appendix 2**  
**Exhibits for**  
**WKMF(FM) Tuscola, Michigan**

## Basic Station Data

Station:	WKMFFM	City:	Tuscola
Frequency:	101.7 MHz	State:	MI
Channel:	269	Country:	US
Class:	A	Coordinates:	N 43 16 12
Facility:	FM		W 83 30 14

Domestic Status: LIC  
File Number: BLH-880404KC  
Docket:  
Cutoff Date:  
Section 73.215: N  
Last Change Date: 940310  
FM Database Date: 940927

	Horizontal	Vertical
ERP:	3.000 kW	3.000 kW
Rad Center AMSL:	334 m	334 m
HAAT:	100 m	100 m
HAAT Max:	133 m	

Beam Tilt: N  
Directional Antenna: N

## Coordination/Notification

International Status:	OPER	Operating primary assignment
Coordination Status:		Not applicable
Border:	Canada	
Distance:	92 km	
Last Notify Date:		
International Class:	B1	

Applicant/Licensee Name  
Radiocom, Ltd.

## Comment

Specially negotiated, short-spaced allotment-Accepted by Canada 940207



FM SEPARATION STUDY

Job Title : Licensed WKMF(FM) CH 269

Separation Buffer 50 km

Channel 269A (101.7 MHz)

FCC DB Date : 10/25/94

Coordinates : 43-16-12 83-30-14

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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WFUMFM	Flint		216B	17.5 DA	42-53-57	175.2	41.35	15
LIC	MI	BLD930906KA	91.1	149.0	83-27-42		26.35	CLEAR
ERP lower than class minimum-Special negotiated short spaced allotment limited to 29Kw at 149m haat.								

WRIF	Detroit		266B	27.0	42-28-15	166.8	91.18	69
LIC	MI	BLH5812	101.1	268.0	83-15-00		22.18	CLEAR
GRANDFATHERED AT 27KW @ 268M HAAT.								

ALC	Sebewaing		267A		43-48-01	8.5	59.59	31
MI	Docket89-38		101.3	.0	83-23-38		28.59	CLEAR
Class B1 in respect to Canada-Accepted by Canada 901105								
Site Restricted-Effective 12-28-89-Rsvd for 871008ID per D89-38								

	Sarnia		268A		42-58-20	109.8	96.00	113
ON			101.5	.0	82-23-48		-17.00	SHORT
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION.								

WPRJ	Coleman		268A	2.2	43-48-41	308.2	98.31	72
LIC	MI	BLH921120KC	101.5	114.0	84-27-57		26.31	CLEAR

WKMF	Tuscola		269A	3.00	43-16-12	.0	.00	115
LIC	MI	BLH880404KC	101.7	100.0	83-30-14		-115.00	SHORT
Specially negotiated, short-spaced allotment-Accepted by Canada 940207								

WILSFM	Lansing		269A	3.3	42-43-16	234.7	104.89	115
LIC	MI	BLH930430KB	101.7	88.0	84-33-01		-10.11	SHORT
Accepted by Canada on 930322								

WNXFM	Wingham		269C1	100. DA	44-05-26	62.9	206.42	256
ON			101.7	216.0	81-12-26		-49.58	SHORT
SPECIALLY NEGOTIATED SHORT-SPACED ALLOCATION								

WDET	Detroit		270B	79.	42-21-28	160.4	107.51	113
LIC	MI	BLH7131	101.9	137.0	83-03-55		-5.49	SHORT
COMM. CH. OPER. EDUC. - GRANDFATHERED AT 79KW @ 137M HAAT.								

WLEWFM	Bad Axe		271C2	50.	43-53-28	23.8	75.54	55
LIC	MI	BLH890117KK	102.1	150.0	83-07-26		20.54	CLEAR